

1 Thomas F. Bertrand, SBN 056560
2 Richard W. Osman, SBN 167993
BERTRAND, FOX & ELLIOT
3 2749 Hyde Street
San Francisco, Ca 94109
4 Telephone: (415) 353-0999
Facsimile: (415) 353-0990
5 Email: rosman@bfesf.com

6 Attorneys for Defendants
CITY OF SAN RAFAEL,
7 RYAN DEMARTA and RYAN COGBILL

8
9 James D. Rush, SBN 240284
LAW OFFICES OF JAMES D. RUSH, APC
10 7665 Redwood Boulevard, Suite 200
Novato, CA 94945
11 Telephone: (415) 897-4801
Facsimile: (415) 897-5316

12 Attorney for Plaintiffs
13 GREGORY L. SULLIVAN and
KOJI FUJITA

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15 GREGORY L. SULLIVAN and
KOJI FUJITA,

16 Plaintiffs,

v.

21 CITY OF SAN RAFAEL, a government
entity; SAN RAFAEL POLICE
22 DEPARTMENT, a government entity;
RYAN DEMARTA, individually, and in
23 his capacity as police officer for the CITY
OF SAN RAFAEL; RYAN COGBILL,
individually, and in his capacity as police
officer for the CITY OF SAN RAFAEL;
24 and DOES 1 to 100,

25 Defendants.

Brian K. Gearinger, SBN 146125
GEARINGER LAW GROUP
825 Van Ness Ave., 4th Floor
San Francisco, CA 94109
Telephone: (415) 440-3175
Facsimile: (415) 440-3103
Email: brian@gearingerlaw.com

Attorneys for Plaintiffs
GREGORY L. SULLIVAN and
KOJI FUJITA

Case No.: CV 12-01922 MEJ

**STIPULATION AND [PROPOSED] ORDER
TO CONTINUE DATES FOR EXPERT
DISCLOSURES AND DISCLOSURES OF
REBUTTAL EXPERTS**

STIPULATION AND [PROPOSED] ORDER TO CONTINUE DATES FOR EXPERT DISCLOSURES AND
DISCLOSURES OF REBUTTAL EXPERTS

Sullivan v. City of San Rafael, et al.

U.S.D.C. Northern District of CA Case No. CV-12-01922 MEJ

RECITALS

1. The parties, by and through their respective counsel, previously stipulated and requested that the March 29, 2013 Expert Disclosure date be continued to April 23, 2013, and the April 8, 2013 Rebuttal Expert Disclosure date be continued to May 3, 2013. [Dkt. No.42.]
2. Based on the Stipulation of March 22, 2013, on March 25, 2013 the Court ordered that the Expert Disclosure date be continued from March 29, 2013 to April 23, 2013 and the Rebuttal Expert date be continued from April 8, 2013 to May 3, 2013. [Dkt. No.43.]

STIPULATION

3. The parties, by and through their respective counsel, hereby stipulate and request that the presently-scheduled April 23, 2013 Expert Disclosure date be continued to May 7, 2013, and the May 3, 2013 Rebuttal Expert Disclosure date be continued to May 17, 2013.

4. Multiple depositions have been taken in the last week and the parties intend to have their experts review and potentially include information from these depositions in their FRCP Rule 26 reports. One deposition is still pending on April 9, 2013 and the parties' experts need time to review all of the deposition transcripts prior to expert disclosures. Moving the expert disclosure dates will accommodate this. Continuing the Expert Disclosure date and the Rebuttal Expert date will not affect any other dates in this case.

SO STIPULATED.

Dated: April 4, 2013

BERTRAND, FOX AND ELLIOT

By: /s/ Richard W. Osman

Richard W. Osman

Attorneys for Defendants

Dated: April 4, 2013

LAW OFFICE OF JAMES D. RUSH

By: /s/ James D. Rush

James D. Rush

1 Attorneys for Plaintiffs
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3 Dated: April 4, 2013

GEARINGER LAW GROUP

4 By: /s/ Brian K. Gearinger
5 Brian K. Gearinger
6 Attorneys for Plaintiffs

7 **[PROPOSED] ORDER**

8 Having reviewed the stipulation of counsel herein, IT IS HEREBY ORDERED that the Expert
9 Disclosure date is continued from April 23, 2013 to May 7, 2013 and the Rebuttal Expert date is
10 continued from May 3, 2013 to May 17, 2013.

11 **IT IS SO ORDERED.**

12 DATED: April 23, 2013

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14 HONORABLE MARIA-ELENA JAMES
15 UNITED STATES MAGISTRATE JUDGE
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